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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta  
Platforms, Inc., et al.*

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**DECLARATION OF ASHLEY M.  
SIMONSEN IN SUPPORT OF META'S  
ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE MOTION FOR  
DISCOVERY SANCTIONS BEFORE  
MAGISTRATE JUDGE KANG AND TO  
SET BRIEFING SCHEDULE**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

**DECLARATION OF ASHLEY M. SIMONSEN**

I, Ashley M. Simonsen, declare and state as follows:

1. I am an attorney with the law firm Covington & Burling, LLP and represent Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta”) in the above-captioned case. The declaration is based on my personal knowledge. If called upon to do so, I could and would competently testify as follows.

2. On December 17, 2024, Meta asked the States if they consented to or opposed Meta’s administrative motion for leave to file a motion for sanctions for States’ repeated violations of this Court’s discovery orders (the “Discovery Sanctions Motion”), including Meta’s proposed briefing schedule on the motion.

3. On December 18, 2024, I conferred with co-lead counsel for the States by telephone about Meta’s administrative motion, the Discovery Sanctions Motion, and Meta’s proposed briefing schedule on the Motion. During that call, I also invited the States to propose an alternative proposed briefing schedule for the Motion, including one that would have the Motion due after the holidays (while still allowing it to be heard at the January 16, 2025 DMC).

4. The States stated that they oppose Meta’s administrative motion and cannot agree at this time to a briefing schedule for Meta’s Discovery Sanctions Motion.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on December 18, 2024.

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen